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February 16, 2021

VIA ECF

New Jersey District Court Clerk United States District Court, D.N.J Mitchell H. Cohen Building 4th and Cooper Streets Camden, New Jersey 08101

RE: Ellaisy v. City of Atlantic City, et.al., 13-cv-05401

Dear Clerk of Court,

On February 9, 2021, Defendants Harris and Rogers filed a Motion to Dismiss Plaintiff's Second Amended Complaint. Plaintiff's response to Defendants' Motion to Dismiss is currently due March 1, 2021. The motion date is scheduled for March 15, 2021. Pursuant to L. Civ. R. 7.1(d)(5), Plaintiff is seeking an automatic extension in which to file his response to Defendants' Motion to Dismiss. The originally noticed motion day has not previously been extended or adjourned and Plaintiff is invoking the provision of L. Civ. R. 7.1(d)(5) before the date in which the opposition papers would otherwise be due. The new motion day requested is April 5, 2021. Thank you for your prompt attention to this matter.

Respectfully submitted,

/s/ Ashley Cohen

Cc: Steven Glickman, Esq.
Todd Gelfand, Esq.
Morrison Fairbairn, Esq.
Alyson Tomljenovic, Esq.